

# Exhibit 14.10

United States' Motion to Enter Consent Decree,  
*United States v. Alden Leeds, Inc. et al.*, Civil Action No. 22-7326 (D.N.J.)

# EXHIBIT A-37

**Appendix A** to OxyChem's Comments in Opposition to Proposed Consent Decree,  
*United States v. Alden Leeds, Inc., et al.*, Civil Action No. 2:22-cv-07326 (D.N.J.)

Summary of Soil Sample Analytical Results for Mercury  
Block 165 Portion of the Former RCA Facility  
Harrison, New Jersey

*DRAFT - For Discussion Purposes Only*

Sample ID:			SB-01(0.5-1.0)	SB-01(4.5-5.0)	SB-02(0.5-1.0)	SB-02(4.0-4.5)	SB-02(5.5-9.0)	SB-03(0.5-1.0)
Sample Depth (feet bgs):			0.5 - 1	4.5 - 5	0.5 - 1	4 - 4.5	5.5 - 9	0.5 - 1
Date Collected:			05/18/17	05/18/17	05/18/17	05/18/17	05/19/17	05/17/17
Lab Sample ID:	RDCSRS	Units	JC43540-3A	JC43540-4V	JC43540-5	JC43540-6A	JC43540-7V	JC43550-7A
Mercury	23	mg/kg	4.1	0.035 U	1.4	15.5	0.034 U	11.3

Sample ID:			SB-03(4.5-5.0)	SB-05(1.5-2.0)	SB-05(13.5-14.0)	SB-06(0.5-1.0)	SB-07(0.5-1.0)	SB-07(17.5-17.5)
Sample Depth (feet bgs):			4.5 - 5	1.5 - 2	13.5 - 14	0.5 - 1	0.5 - 1	17 - 17.5
Date Collected:			05/17/17	05/17/17	05/17/17	05/18/17	05/18/17	05/15/17
Lab Sample ID:	RDCSRS	Units	JC43550-8A	JC43550-10W	JC43550-10W	JC43550-10A	JC43550-1A	JC43550-2B
Mercury	23	mg/kg	0.16	0.049	0.034 U	0.035 U	0.87	0.036 U

Sample ID:			SB-09(0.5-1.0)	SB-09(0.5-1.0)	SB-10(0.5-1.0)	SB-10(5.5-6.0)	SB-12(0.5-1.0)	SB-13(0.5-1.0)
Sample Depth (feet bgs):			0.5 - 1	0.5 - 1	0.5 - 1	5.5 - 6	0.5 - 1	0.5 - 1
Date Collected:			05/22/17	05/18/17	05/18/17	05/18/17	05/18/17	01/25/18
Lab Sample ID:	RDCSRS	Units	JC43550-1A	JC43540-3A	JC43550-3A	JC43550-4B	JC43540-1A	JC59750-1
Mercury	23	mg/kg	0.09	0.8	1.2	0.035 U	0.081	0.65 J

Sample ID:			SB-15(1.5-2)	SB-15(3-3.5)	SB-14(0.5-1.0)	SB-14(1.5-2.0)	SB-14(4.0-4.5)	SB-15(0.5-1.0)
Sample Depth (feet bgs):			1.5 - 2	3 - 3.5	0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1
Date Collected:			01/25/18	01/25/18	01/25/18	01/25/18	01/25/18	05/17/17
Lab Sample ID:	RDCSRS	Units	JC59750-2	JC59750-3	JC59051-25	JC59051-27	JC59051-28B	JC43550-5A
Mercury	23	mg/kg	0.62	0.14	0.032 U	0.035 U	0.034 U	0.035

Notes:

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Sample ID			SB-16(0.5-1.0)	SB-17(0.5-1.0)	SB-17(4.5-5.0)	SB-18(0.5-1.0)	BD-2(060517)	SB-19(0.5-1.0)
Sample Depth (feet bgs)			0.5 - 1	0.5 - 1	4.5 - 5	0.5 - 1	4 - 4.5	0.5 - 1
Date Collected			05/17/17	05/17/17	05/17/17	05/05/17	05/05/17	05/16/17
Lab Sample ID	RDCSRS	Units	JC43550-3A	JC43550-1A	JC43550-2A	JC44520-1A	JC44520-5B	JC43445-3A
Mercury	23	mg/kg	2.5	1.3	0.037 U	0.84 [0.48]	[0.037]	1.3

Sample ID			SB-19(0.5-1.0)	SB-19(10.5-17)	SB-20(0.5-1.0)	SB-20(17.5-16)	SB-21(0.5-1.0)	SB-22(0.5-5.5)
Sample Depth (feet bgs)			0.5 - 1	10.5 - 17	0.5 - 1	17.5 - 16	0.5 - 1	0 - 5.5
Date Collected			05/16/17	05/15/17	05/15/17	05/16/17	05/24/17	05/05/17
Lab Sample ID	RDCSRS	Units	JC43445-2A	JC43445-10B	JC43445-7A	JC43445-5B	JC44025-5A	JC44025-77
Mercury	23	mg/kg	1.3	0.94	5.7	0.036 U	2.3	0.037 U

Sample ID			SB-25(0.5-1.0)	SB-25(3.5-4.0)	SB-25(10.5-19.0)	SB-26(0.5-1.0)	SB-26(16.5-17.0)	SB-26(0.5-1.0)
Sample Depth (feet bgs)			0.5 - 1	3.5 - 4	10.5 - 19	0.5 - 1	16.5 - 17	0.5 - 1
Date Collected			05/25/17	05/25/17	05/25/17	05/19/17	05/19/17	05/19/17
Lab Sample ID	RDCSRS	Units	JC44134-7A	JC44134-9B	JC44134-6U	JC43750-7A	JC43750-4U	JC43750-3A
Mercury	23	mg/kg	0.035 U	91.7	0.042	1.5	0.038 U	1.5

Sample ID			SB-29(10.5-11.0)	SB-29(0.5-1.0)	SB-29(4.5-5.0)	SB-30(0.5-1.0)	SB-30(11.5-12.0)	SB-31(0.5-1.0)
Sample Depth (feet bgs)			10.5 - 11	0.5 - 1	4.5 - 5	0.5 - 1	11.5 - 12	0.5 - 1
Date Collected			05/19/17	05/19/17	05/19/17	05/19/17	05/19/17	05/19/17
Lab Sample ID	RDCSRS	Units	JC43730-1B	JC43730-9A	JC43730-10U	JC43730-1A	JC43730-2U	JC43840-1A
Mercury	23	mg/kg	0.037 U	0.41	0.033 U	0.41	0.25	0.92

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Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-31(0.5-1.0)	SB-32(0.5-1.0)	SB-32(0.5-4.0)	SB-33(0.5-1.0)	SB-33(1.5-2.0)	SB-34(4.0-4.5)
						1.5 - 3	0.5 - 1	3.5 - 4	0.5 - 1	1.5 - 2	4 - 4.5
						05/18/17	05/18/17	05/18/17	01/25/18	01/25/18	01/25/18
						JC43540-2V	JC43735-6A	JC43745-4U	JC59765-5	JC59765-6	JC63765-7A
Mercury	23				mg/kg	0.036 U	0.46	0.25	0.035 U	0.034 U	0.034 U

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-34(0.5-1.0)	SB-34(1.5-2.0)	SB-34(4.0-4.5)	SB-35(0.5-1.0)	SB-35(1.5-2.0)	SB-36(4.0-4.5)
						0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1	1.5 - 2	4 - 4.5
						01/25/18	01/25/18	01/25/18	01/25/18	01/25/18	01/25/18
						JC59765-7	JC59765-8	JC59765-11A	JC59765-10	JC59765-12	JC59765-12A
Mercury	23				mg/kg	0.18	0.034 U	0.036 U	0.7	0.035 U	0.035 U

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-36(0.5-1.0)	SB-36(1.5-2.0)	SB-36(4.0-4.5)	SB-38(0.5-1.0)	SB-44(0.5-1.0)	SB-44(1.5-4.0)
						0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1	0.5 - 1	3.5 - 4
						01/25/18	01/25/18	01/25/18	06/08/17	05/25/17	05/25/17
						JC59651-15	JC59651-16	JC59651-15B	JC44501-1	JC44190-1V	JC44190-2V
Mercury	23				mg/kg	0.74	0.035 U	0.037 U	1.5 [0.4]	0.037 U	0.034 U

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-46(0.5-1.0)	SB-46(4.0-4.5)	SB-47(0.5-1.0)	SB-47(4.0-4.5)	SB-49(1.0-1.5)	SB-50(5.5-1.0)
						0.5 - 1	4 - 4.5	0.5 - 1	4 - 4.5	1 - 1.5	0.5 - 1
						05/25/17	05/25/17	05/25/17	05/25/17	05/30/17	05/30/17
						JC44134-4U	JC44134-5U	JC44025-1W	JC44025-2W	JC44185-2T	JC44012-1T
Mercury	23				mg/kg	0.89	0.035 U	0.038 U	0.036 U	0.18	0.040 U

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						0.5 - 1	0.5 - 1	1.5 - 2	0.5 - 1	1.5 - 2	4 - 4.5
						09/02/17	01/23/18	01/24/18	01/23/18	01/23/18	01/23/18
						JC44512-5T	JC55675-1A	JC55675-13A	JC55675-2A	JC55675-3A	JC55675-4A
Mercury	23				mg/kg	0.037 U	1.9	7.4	1.8	0.034 U	0.2

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-04(0.5-1.0)	SB-04(1.5-2.0)	SB-04(4.0-4.5)	SB-05(0.5-1.0)	SB-05(1.5-2.0)	SB-05(3.0-3.5)
						0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1	1.5 - 2	3 - 3.5
						01/23/18	01/23/18	01/23/18	01/26/18	01/26/18	01/26/18
						JC55675-5A	JC55675-6A	JC55675-7A	JC55675-10	JC55675-11	JC55675-12A
Mercury	23				mg/kg	3.9	5.3	0.038	0.23 [0.74]	1.1	0.07

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-09(0.5-1.0)	SB-09(1.5-2.0)	SB-09(4.0-4.5)	SB-09(0.5-1.0)	SB-09(1.5-2.0)	SB-09(4.0-4.5)
						0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1	1.5 - 2	4 - 4.5
						01/22/18	01/23/18	01/23/18	01/22/18	01/23/18	01/23/18
						JC55675-3A	JC55675-4	JC55675-5	JC55675-5A	JC55675-6	JC55675-7
Mercury	23				mg/kg	2.1	0.85	0.2	0.51	38.8	80.3

Sample ID	Sample Depth (feet bgs)	Date Collected	Lab Sample ID	RDCSRS	Units	SB-00(0.5-1.0)	SB-00(1.5-1.8)	SB-01(0.5-1.0)	SB-01(1.5-2.0)	SB-01(3.0-3.5)	SB-02(0.5-1.0)
						0.5 - 1	1.5 - 1.75	0.5 - 1	1.5 - 2	3 - 3.5	0.5 - 1
						01/24/18	01/24/18	01/24/18	01/24/18	01/24/18	01/23/18
						JC55675-20A	JC55675-21A	JC55675-22A	JC55675-23A	JC55675-24A	JC55675-25A
Mercury	23				mg/kg	1	1.2	0.17	3	2.6	1.7

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Sample ID:			SB-42(1.5-2.0)	SB-42(3.0-3.5)	SB-43(0.5-1.0)	SB-43(1.5-2.0)	SB-44(3.0-4.5)	SB-44(5.0-1.0)
Sample Depth (feet bgs):			1.5 - 2	3 - 3.5	0.5 - 1	1.5 - 2	3 - 3.5	0.5 - 1
Date Collected:			01/23/18	01/23/18	01/24/18	01/24/18	01/24/18	01/24/18
Lab Sample ID:	RDCSRS	Units	JC55570-2	JC55570-3	JC55575-26A	JC55575-27A	JC55575-28A	JC55575-29A
Mercury	23	mg/kg	0.48	0.6	0.23	62	5.2	0.67 J

Sample ID:			SB-44(1.5-2.0)	SB-44(4.0-4.5)	SB-45(0.5-1.0)	SB-45(1.5-2.0)	SB-45(4.0-4.5)	SB-45(5.0-1.0)
Sample Depth (feet bgs):			1.5 - 2	4 - 4.5	0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1
Date Collected:			01/24/18	01/24/18	01/23/18	01/23/18	01/23/18	01/23/18
Lab Sample ID:	RDCSRS	Units	JC55575-30A	JC55575-31A	JC55575-32A	JC55575-33A	JC55575-34A	JC55575-35A
Mercury	23	mg/kg	1.5	0.034 U	0.038 U	0.036 U	0.034 U	0.42

Sample ID:			SB-46(1.5-2.0)	SB-46(3.5-4.0)	SB-47(0.5-1.0)	SB-47(1.5-2.0)	SB-47(4.0-5.0)	SB-48(0.5-1.0)
Sample Depth (feet bgs):			1.5 - 2	3.5 - 4	0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1
Date Collected:			01/23/18	01/23/18	01/23/18	01/23/18	01/23/18	01/23/18
Lab Sample ID:	RDCSRS	Units	JC55579-11A	JC55579-12A	JC55581-4	JC55581-5	JC55581-6	JC55581-7
Mercury	23	mg/kg	0.24	0.21	1.2 [1.4]	0.12	0.043	3.6

Sample ID:			SB-69(1.5-3)	SB-69(3.5-4)	SB-69(0.5-1)	SB-69(1.5-2)	SB-69(4-4.5)	SB-70(5.5-1.0)
Sample Depth (feet bgs):			1.5 - 3	3.5 - 4	0.5 - 1	1.5 - 2	4 - 4.5	0.5 - 1
Date Collected:			01/25/18	01/25/18	01/25/18	01/26/18	01/26/18	01/26/18
Lab Sample ID:	RDCSRS	Units	JC55756-14	JC55756-15	JC55951-1	JC55951-2	JC55951-3	JC55951-11
Mercury	23	mg/kg	0.62	0.036 U	2.4 [3.3]	0.8	0.084	0.50 [0.38]

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Sample ID			SB-70(1.5-2.0)	SB-70(3.5-4.0)	SB-71(0.5-1.0)	SB-71(1.5-2.0)	SB-71(4.0-4.5)	SB-72(0.5-1)
Sample Depth (feet bgs)			1.5-2	3.5-4	0.5-1	1.5-2	4-4.5	0.5-1
Date Collected			01/29/18	01/29/18	01/29/18	01/29/18	01/29/18	01/29/18
Lab Sample ID	RDCSRS	Units	JC55920-12	JC55920-13	JC55920-5	JC55920-5	JC55920-10	JC55951-7
Mercury	23	mg/kg	1.1	0.6	3.2 [2.1]	2.2	0.72	1.7

Sample ID			SB-72(1.5-2)	SB-72(4-4.5)	SB-73(0.5-1.0)	SB-73(1.5-2.0)	SB-73(4-4.5)	SB-74(0.5-1.0)
Sample Depth (feet bgs)			1.5-2	4-4.5	0.5-1	1.5-2	4-4.5	0.5-1
Date Collected			01/29/18	01/29/18	01/24/18	01/24/18	01/24/18	01/24/18
Lab Sample ID	RDCSRS	Units	JC55951-5	JC55951-9	JC55970-14A	JC55970-14A	JC55970-15A	JC55970-16A
Mercury	23	mg/kg	0.36	0.035 U	1	0.066	0.035 U	3.1

Sample ID			SB-74(1.5-2.0)	SB-74(4-4.5)	SB-83(1.5-2.0)
Sample Depth (feet bgs)			1.5-2	4-4.5	1.5-2
Date Collected			01/24/18	01/24/18	02/16/18
Lab Sample ID	RDCSRS	Units	JC55970-17A	JC55970-18A	JC55947-3
Mercury	23	mg/kg	0.086	0.19	0.034 U

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